

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Carrier Oversight & Programs Branch**

**RESOLUTION T- 17466  
DECEMBER 18, 2014**

**R E S O L U T I O N**

Resolution T-17466. This Resolution conditionally grants the request of Global Connection, Inc. of America, doing business as “*Stand Up Wireless*,” to be designated as an Eligible Telecommunications Carrier to provide only federal Lifeline wireless service in specified areas of California.

**Summary**

By this Resolution, the California Public Utilities Commission (CPUC or Commission) conditionally grants the request of Global Connection Inc. of America (Global Connection) (U-4423-C), a wireless carrier doing business as “*Stand Up Wireless*,” to be designated as an Eligible Telecommunications Carrier (ETC) to provide only federal Lifeline wireless service to qualifying customers in California in the service areas of the Uniform Regulatory Framework (URF) carriers<sup>1</sup> excluding the Small Local Exchange Carriers (Small LECs)<sup>2</sup> service areas.<sup>3</sup> Global Connection seeks federal Lifeline support only and does not seek California LifeLine fund support.

**Background**

Congress directed the Federal Communications Commission (FCC) to establish universal service support mechanisms to ensure that “[q]uality services [are] available at just, reasonable, and affordable rates” for consumers throughout the nation.<sup>4</sup> The FCC’s and the CPUC’s Lifeline programs further this goal by providing discounts on monthly telephone services to eligible low-income consumers.

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<sup>1</sup> The URF carriers are AT&T California, Verizon California, Surewest Telephone, Frontier Communications of California, and Frontier of the South West.

<sup>2</sup> The Small LECs group is composed of Calaveras Telephone Co. (U-1004-C), Cal-Ore Telephone Co. (U-1006-C), Ducor Telephone Co. (U-1007-C), Foresthill Telephone Co. (U-1009-C), Happy Valley Telephone Co. (U-1010-C), Hornitos Telephone Co. (U-1011-C), Kerman Telephone Co. (U-1012-C), Pinnacles Telephone Co. (U-1013-C), Ponderosa Telephone Co. (U-1014-C), Sierra Telephone Co. (U-1016-C), Siskiyou Telephone Co. (U-1017-C), Volcano Telephone Co. (U-1019-C), Winterhaven Telephone Co. (U-1021-C), and Frontier Communications West Coast (U-1020-C). These telephone companies generally operate in rural areas and have regulated rates.

<sup>3</sup> See Global Connection Inc. of America’s Advice Letter 2 (filed September 11, 2013), Advice Letter 2A (April 9, 2014), Advice Letter 2B (July 31, 2014), and Advice Letter 2C (August 29, 2014).

<sup>4</sup> 47 U.S.C. § 254(b)(1).

### **Federal ETC Designation Requirements**

In order to receive federal universal service support, an applicant must be designated as an ETC. Section 254(e) of the Communications Act (the Act), as amended, states that “only an eligible telecommunications carrier under section 214(e) shall be eligible to receive specific federal universal service support.”<sup>5</sup>

Under Section 214(e)(2) of the Act, state commissions are given the primary responsibility for designating ETCs in their states. This section states that, “[u]pon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the state commission” so long as the requesting carrier meets the requirements of Section 214(e)(1). Section 214(e)(1) provides that, a common carrier designated as an ETC must offer services supported by the federal Universal Service Fund (USF) throughout the designated service area either by using its own facilities, resale, or by a combination of its own facilities and resale of another carrier’s services and must advertise the services and the related charges using advertising media of general distribution throughout the designated service area. Advertising must include the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services.

In addition, the FCC’s rules require that a carrier requesting ETC designation must:

1. Certify that it will comply with the service requirements applicable to the support that it receives;
2. Submit a five-year plan that describes proposed improvements or upgrades to the applicant’s network throughout its proposed service area;
3. Demonstrate its ability to remain functional in emergency situations;
4. Demonstrate that it will satisfy applicable consumer and service quality standards;
5. Demonstrate that it is financially and technically capable of providing the Lifeline service; and
6. Submit information describing the terms and conditions of any voice telephone service plans offered to Lifeline customers.<sup>6</sup>

Before granting an ETC status to a carrier, state commissions must determine that it is in the public interest to do so.

The federal Lifeline program reimburses ETCs for providing discounts to eligible low-income customers of \$9.25 per month and provides additional reimbursements for serving customers living on Tribal lands.<sup>7</sup>

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<sup>5</sup> 47 C.F.R. §§ 54.400 *et seq.* contains the FCC’s Lifeline rules issued to implement § 254 of the Act. Section 54.401 defines Lifeline as a non-transferrable retail service offering for which qualifying low-income consumers pay a reduced charge for voice telephony service after applying the federal Lifeline support amount.

<sup>6</sup> 47 C.F.R. § 54.202(a).

### **California Public Utilities Commission ETC Designation Requirements**

A carrier seeking an ETC designation must also comply with the CPUC's ETC rules. In Resolution T-17002 (May 25, 2006), the CPUC adopted *The Comprehensive Procedures and Guidelines for ETC Designation and Requirements for ETCs* that are consistent with FCC Order 97-157 regarding designation of a telephone carrier as a qualified ETC. Pursuant to that Resolution, applicants seeking ETC designation in California are required to provide the following:

1. A description of the proposed service offerings and attached service area maps; description of the advertising plan(s);
2. A statement of commitment to provide service;
3. Submission of the 2-year service quality improvement plan;
4. A showing of the ability to remain functional;
5. A statement of commitment to consumer protection;
6. Demonstration that a carrier's usage plan is comparable to that of the incumbent LEC in the proposed service area; and
7. A public interest determination.

In addition, ETC designation requests must comply with General Order (GO) 153 which implements the *Moore Universal Telephone Service Act*. GO 153 contains California LifeLine program requirements. ETCs are required to comply with GO 153 requirements, including the California Third-Party Administrator's (TPA) determination of customer eligibility for certifications and renewals. Carriers must also comply with CPUC User Fee and surcharge obligations. The CPUC User Fee is levied on all telecommunications carriers providing services directly to customers and the amount of fees is a percentage calculation based on all intrastate customer billings for telecommunications services. All telecommunications carriers that provide basic telephone service are also required to collect and remit Public Purpose Program (PPP) surcharges from end-users that fund the CPUC's universal service program.

### **Notice/Protests**

Global Connection served its advice letter filing via email on all parties on the ETC service list and the advice letter appeared in the Commission's Daily Calendar on April 2, 2013. No protests were received.

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<sup>7</sup> 47 C.F.R. § 54.403.

## Discussion

### **Company Overview and Proposed Lifeline Rate Plans**

Global Connection Inc. of America (Global Connection), doing business as “*Stand Up Wireless*,” is a prepaid wireless service provider with principal offices at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia, 30093. Global Connection provides local exchange telecommunications services throughout the United States and is designated as an ETC on a wireline basis in six states. As well, Global Connection, under its dba “*Stand Up Wireless*,” provides prepaid wireless telecommunications services using the Spring PCS network on a wholesale basis. “*Stand Up Wireless*” obtains from Sprint via an agreement with Boomerang Wireless, LLC, dba Ready Mobile, the network infrastructure and wireless transmission facilities to operate as a mobile virtual network operator (MVNO). “*Stand Up Wireless*” is a designated ETC in 26 states and Puerto Rico and has pending ETC requests with the FCC and two states.

On March 22, 2012, the Commission issued Global Connection its Wireless Identification Registration number U-4423-C allowing it to operate as a commercial mobile radio service (CMRS) provider in California.

On March 26, 2013, Global Connection filed Tier III Advice Letter (AL) 1 requesting ETC designation to receive federal support to provide only federal Lifeline prepaid wireless service to eligible customers doing business as “*Stand Up Wireless*” and proposing to offer five Lifeline-only plans to which it will apply the \$9.25 federal support amount. Global Connection does not seek California LifeLine fund support.

On November 10, 2014, Global Connection filed AL Supplement 1A requesting to modify its original service offerings and revise its list of GO 153 waivers. The new Lifeline wireless service plans are:

- *Stand Up 1,000 Plan* for \$12.65 per month
- *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month
- *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month

Each Lifeline rate plan is subject to a one-time \$39 activation fee or service conversion fee. Additional minutes can be purchased in increments of 100 units for \$5 or 250 units for \$12.75, both at \$0.05 per minute.

### **Compliance with Federal Rules**

#### **Federal ETC Requirements:**

A carrier must satisfy all FCC ETC requirements in order to receive an ETC designation. Global Connection has met the following federal ETC requirements:

**Demonstration that the services intended to be offered comply with the voice telephony definition** - Pursuant to 47 U.S.C. § 214(e)(1) and (6), Global Connection

submits that it is a common carrier and is able to provide telephone exchange and exchange access through its agreements with its underlying facilities-based provider, Sprint PCS, through Boomerang Wireless, LLC dba Ready Mobile.

**Advertise using media of general distribution** – Global Connection demonstrates that its Lifeline services meet the definition of voice telephony and commits to advertise in a manner reasonably designed to reach those likely to qualify for Lifeline using any California-specific advertising requirements such as media of general distribution which may include advertising via newspaper, mail circular, web media, and radio, among other media, and target residential customers with its advertising efforts.

**Commitment to provide supported service throughout the designated service area** – Global Connection commits to provide service to all requesting customers in the areas that it is designated an ETC. CD has concerns about how Global Connection, a reseller that obtains services from an underlying facilities-based carrier and another reseller, could commit to provide service to a Lifeline customer within the service area but outside of its existing network coverage as required by FCC rules.<sup>8</sup>

To address staff's concern and ensure that Global Connection complies with its obligation to provide service to prospective Lifeline customers within the network service area pursuant to FCC rules, CD staff recommends that the Commission require Global Connection to submit an Information Only<sup>9</sup> report quarterly to the Communications Division Director beginning in the first quarter 2015. The report would include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities, or employing, leasing or constructing an additional cell site); and, the date of completion.

**Demonstration of ability to remain functional** – Global Connection's agreements with its resellers allow the company to provide to its customers the same ability to remain functional in emergency situations as currently provided by the underlying carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities and the capability of managing traffic spikes resulting from emergency situations. Sprint has redundancies, back-up generator power, and extensive disaster recovery programs.

**Reseller's submission of FCC-approved *compliance plan*** – Global Connection submitted a compliance plan approved by the FCC on May 25, 2012.

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<sup>8</sup> FCC 05-46, ¶ 22, released March 17, 2005, and as adopted in CPUC Resolution T-17002, Appendix A §2, effective May 25, 2006.

<sup>9</sup> General Order 96-B General Rules §§ 3.9 and 6.

**Demonstration of financial and technical capability** – Global Connection is financially and technically capable of providing Lifeline services. Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011 in other states. Global Connection generates substantial revenues from non-Lifeline services and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Global Connection has not relied and will not rely exclusively on Lifeline reimbursements for its operating revenues. Senior management of “*Stand Up Wireless*” has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise. Also, as a reseller of wireless service, Global Connection will rely upon the managerial and technical expertise of its underlying carriers, Sprint and Boomerang Wireless.

**Commitment to meet public interest requirements for the proposed service areas** – Global Connection asserts that it meets the FCC public interest criteria because as an ETC, it will offer the advantages of convenience and security, benefits of additional competitive choices, and quality services to low-income customers.

**Commitment to satisfy all applicable consumer protection and service quality standards** –ETCs commit to adhere to applicable state and federal consumer protection and service quality standard requirements including the Cellular Telecommunications and Internet Association’s (CTIA) *Consumer Code for Wireless Service*. Global Connection agrees to abide by all applicable state and federal consumer protection and service quality standard requirements and commits to comply with CTIA’s *Consumer Code for Wireless Service*.<sup>10</sup> The CTIA code is an “evolving” code of consumer protections and commitment to adhere to the CTIA Code includes a commitment by an ETC to adhere to the CTIA Code as amended from time to time.

**Agreement to apply the Lifeline support discount to residential retail plans** – Global Connection states that it will apply the \$9.25 federal Lifeline support amount to its proposed plans.

CD staff finds that Global Connection did not demonstrate compliance with the following three federal ETC requirements and makes these recommendations:

- 1) Global Connection did not specifically address its commitment to file annually federal compliance reports<sup>11</sup>, including but not limited to, Form 481. CD staff recommends that the Commission direct Global Connection to file federal compliance reports with the FCC and USAC and provide copies of these reports to this Commission, as directed.

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<sup>10</sup> *Consumer Code for Wireless Service* at <http://www.ctia.org/policy-initiatives/voluntary-guidelines/consumer-code-for-wireless-service>.

<sup>11</sup> 47 C.F.R § 54.422.

- 2) Global Connection did not confirm that, when approved for ETC designation, it will submit specific information to USAC. Federal law, 47 C.F.R. § 54.401(d), requires that when a state commission designates a carrier an ETC status, the state commission shall file or require the ETC to file information with USAC that demonstrates that the ETC's Lifeline plan meets the universal service support criteria for low-income consumers, including the terms and conditions of voice telephony service plans and the plan details.<sup>12</sup> To comply with § 54.401(d), CD recommends that the Commission direct Global Connection to file the applicable information directly with USAC. Once USAC approves the service plans, Global Connection shall provide to the Communications Division Director a copy of the information submitted to USAC and a copy of Global Connection's certification of approval from the USAC within 30 days of receipt from USAC.

With implementation of the recommendations covered above, CD staff believes Global Connection would be compliant with FCC ETC requirements.

### **Compliance with CPUC Rules**

#### **GO 153 Basic Service Elements Compliance:**

GO 153 requires carriers that seek an ETC designation to comply with 22 basic service elements of California LifeLine. (See *Attachment B* of this resolution for a complete list of California LifeLine basic service requirements.)<sup>13</sup> Global Connection requested a waiver of the following California LifeLine basic service elements: (4) the ability to receive free incoming calls, (10) customer choice of local flat-rate or measured-rate service, (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory, (15) free access to 800 and 800-like toll-free numbers, (19) free access to toll-blocking service, and (20) free access to toll-control service.<sup>14</sup>

CD staff recommends granting waivers from elements (4), (10), (11), (12), and (15) because they do not apply to wireless service providers but to providers of wireline services; the Commission has granted such waivers in the past. Likewise, CD staff recommends granting waivers from elements (19) and (20) since there is no distinction between the local and long distance usage of minutes offered in Global Connection's proposed plans and therefore, toll-blocking or toll-control services do not apply.

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<sup>12</sup> USAC requires a copy of a new ETC's designation order issued by its state utility regulator, <http://usac.org/li/telecom-carriers/step03/default.aspx>. Site last visited October 20, 2014.

<sup>13</sup> Current GO 153 continues to be used to evaluate ETC designation request by wireless carriers including federal Lifeline applications and renewals until the Commission revises GO 153 and determines the extent to which revised GO 153 rules and revised California LifeLine service elements should apply to federal Lifeline wireless offerings in Rulemaking 11-03-013.

<sup>14</sup> D.10-11-033 (November 19, 2010).

**LifeLine Third Party Administrator:**

GO 153, § 4.2 related to California LifeLine enrollment procedures provides a reasonable means for wireless carriers to determine if a prospective low-income customer is eligible for federal Lifeline wireless service. In California, the California LifeLine Administrator (CLA) performs enrollment application and renewal functions.<sup>15</sup> Global Connection agrees to comply with GO 153 requirements, including consumer enrollment, prequalification, certification, eligibility verification and annual renewal, and working with the CLA. Until a customer is approved by the CLA, Global Connection will provide service to the customer at regular retail rates. Upon approval for Lifeline, “*Stand Up Wireless*” will credit the customer’s account with the Lifeline discount retroactive to the application date.

CD staff, however, recommends that the Commission require Global Connection to label clearly its wireless offerings as “*federal Lifeline service*”. Doing so would minimize customer confusion between the California LifeLine and federal Lifeline programs and would disseminate adequate information about potential coverage and service quality issues. Global Connection should also provide copies of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures to CPUC California LifeLine staff for review and approval prior to publication and distribution.

**Resolution T-17002 Compliance:**

Global Connection has satisfied the applicable requirements set forth in Resolution T-17002 including, but not limited to: providing Lifeline-only services within the proposed service area; providing the designated services; and, complying with advertising rules as required by the FCC, such as using printed advertisements, which will state clearly that the Lifeline support is from the federal Lifeline program only.

Global Connection is current with payment of the annual PUC User Fees and universal service public purpose program surcharges. As a condition of its Commission authority and its ETC designation, Global Connection must continue to remain current with its payments. The Commission may revoke Global Connection’s ETC designation and/or operating authority if the company does not remit timely fees and surcharges and the Commission will notify the USAC and the FCC of the revocation.

Global Connection states it has the ability to remain functional in emergency situations by working with its underlying carriers, Sprint and Boomerang Wireless. Global Connection commits to satisfy all applicable state and federal requirements related to consumer protection and service quality standards.

**Providing Federal Lifeline Wireless Service to Customers in Small LEC Service Areas:**

Global Connection does not seek ETC designation in the service areas of the Small LECs. Consistent with the policy adopted in Resolution T-17284, Global Connection will coordinate

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<sup>15</sup> GO 153, § 4.2.1. The current California LifeLine Administrator is Xerox.



with the Small LECs using their list of the ZIP+4 codes<sup>16</sup> associated with the Small LECs service areas. Global Connection will use that data to ensure that no federal Lifeline wireless service is offered to customers residing in the Small LECs' service areas.

CD staff recommends that the Commission require the Small LECs to provide to Global Connection, as they do for all current ETCs, an updated ZIP+4 code data list of the Small LECs' service areas<sup>17</sup> within 30 days of the effective date of this Resolution, as appropriate for the carrier and the service area. The Small LECs should also be required to provide to Global Connection any update to the ZIP+4 code data, as needed. Global Connection should file a copy of any updated ZIP+4 code data list with the Communications Division Director and the CLA. The ZIP+4 code data shall be provided in an MS Excel file (.xls) format via email to the CD Director. The Small LECs also shall provide the CLA the ZIP+4 code data in a format specified by the CLA.

#### **Public Interest Determination:**

Before recommending designation of a carrier as an ETC, CD staff must determine that doing so would be in the public interest for California consumers.<sup>18</sup> In the Lifeline Order, the FCC clearly states the importance of promoting universal service principles<sup>19</sup> and in that context that the Lifeline program includes a public interest determination particularly for Lifeline-only ETCs where forbearance of the facilities-based requirement exists.<sup>20</sup> As a reseller with expanded area, Global Connection often will serve a larger local calling area than a traditional wireless provider and will afford the customer the convenience of telephony mobility. Lifeline-eligible customers will have another provider choice which likely may expand participation of qualifying customers in the Lifeline program.

Upon review, CD staff finds that Global Connection meets the federal ETC criteria for public interest determination including providing the benefits of increased competitive choice, convenience, security with mobility, ability to purchase additional usage, and the ability to use supported service to send and receive text messages in a prepaid plan.

#### **Price Analysis**

When analyzing Lifeline plan pricing, CD staff considers non-Lifeline retail plan prices, relying on competitive forces to determine what plans are reasonable, as well as currently available federal Lifeline retail plans. In addition, CD staff evaluated Global Connection's proposed offerings using the expected monthly cost to a low-income consumer based on

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<sup>16</sup> ZIP+4 code is the standard ZIP code with a four digit add-on code. This add-on code identifies a smaller geographic region within the main code, such as a city block, office building, etc. In Resolution T-17284, Virgin Mobile was required to screen prospective Lifeline customers to ensure they do not reside in the Small LECs' territories. The screening can be accomplished by using the list of ZIP+4 codes for the Small LEC service areas.

<sup>17</sup> On July 5, 2011, the Small LECs filed with the CPUC the ZIP+4 code data pursuant to Resolution T-17284. On July 6, 2011, Frontier Communications West Coast, Inc. filed the ZIP+4 code data for its service areas pursuant to T-17284.

<sup>18</sup> *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Dkt 96-45 (FCC 05-46), released Mar 17, 2005 ¶ 40 and CPUC Resolution T-17002, *Appendix A, Section II-G: Public Interest Determination*.

<sup>19</sup> 47 U.S.C. § 254(b)(c)(e)(2).

<sup>20</sup> *Lifeline Reform Order* at ¶¶ 219, 378, 362, and fn 968.

average minutes of use of 615 minutes per month<sup>21</sup> compared to similar incumbent local exchange carrier (ILEC) Lifeline plans and other wireless ETC Lifeline plans. Global Connection's *Stand Up 1,000 Plan* for \$12.65 per month, *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month, and *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month exceed average minutes of use per month and have equal or better value for low-income customers when compared to similar prepaid wireless Lifeline packages. See Chart 1 below.

Chart 1 -- Comparison of Proposed Federal Lifeline Wireless Plans to Other Prepaid Federal Lifeline Wireless Plans in Service Area (Assuming Average Wireless MOU)

	Prepaid Wireless Lifeline Plans -- 1,000 Minutes						
Global Connection Inc of America dba Stand Up Wireless	Air Voice 1000	i-wireless 1000 Minutes & 200 MB Data	Stand Up 1,000	Virgin Mobile 1000	Nexus 1000	TAG Mobile Plan 1000	Budget Mobile 1000
Avg. MOU*	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	1000	1000	1000	1000	1000	1000	1000
Texts included	1 txt = 1 min	1 txt = 1 min	1000	1000	-	1000	250
Data included	-	200 MB	-	-	-	-	-
Avg. Excess MOUs	-	-	-	-	-	-	-
Cost per Min in excess of allowance **	-	-	-	-	-	-	-
Cost of excess minutes	-	-	-	-	-	-	-
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$12.65	\$12.65	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00
Total GO 153 Cost to Customers	\$12.65	\$12.65	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00
Caller ID	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Long Distance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Voicemail	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Federal Excise Tax	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Additional costs of vertical features	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Cost to Lifeline Customers with 615 MOU and additional costs of vertical features	\$12.65	\$12.65	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00
Plan choices based on AL Supplement 1A filed November 10, 2014.							
* Average Minutes of Use based on FCC 13-34 16th Mobile Wireless Competition Report issued March 19, 2013, Table 38. Avg MOU 615, Year 2011.							

<sup>21</sup> In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services, WT Dkt. No. 11-186 (FCC 13-34) (Sixteenth Report on Mobile Competition). The FCC annually issues a mobile competition report which reflects analysis of 2011 data submitted by carriers. CD staff analysis uses the 615 average minutes of use (MOU) for wireless voice as a base to evaluate Lifeline plan offerings (Table 38).

Prepaid Wireless Lifeline Plans -- Unlimited								
Global Connection Inc of America dba Stand Up Wireless	Cricket Unlimited	Total Call Unlimited Talk & Text	Virgin Mobile Unlimited	TAG Mobile Plan Unlimited	Stand Up Unlimited Talk & Text	Budget PrePay Unlimited Talk/Text	Stand Up Unlimited Talk & Text & 1 GB Data	Total Call Unlimited Talk, Text, & Data
Avg. MOU*	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Texts included	-	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data included	-	-	-	-	-	-	1 GB	Unlimited
Avg. Excess MOUs	-	-	-	-	-	-	-	-
Cost per Min in excess of allowance **	-	-	-	-	-	-	-	-
Cost of excess minutes	-	-	-	-	-	-	-	-
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$21.50	\$29.99	\$30.00	\$30.00	\$30.75	\$32.00	\$35.75	\$39.99
Total GO 153 Cost to Customers	\$21.50	\$29.99	\$30.00	\$30.00	\$30.75	\$32.00	\$35.75	\$39.99
Caller ID	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Long Distance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Voicemail	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Federal Excise Tax	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Additional costs of vertical features	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Cost to Lifeline Customers with 615 MOU and additional costs of vertical features	\$21.50	\$29.99	\$30.00	\$30.00	\$30.75	\$32.00	\$35.75	\$39.99
Plan choices based on AL Supplement 1A filed November 10, 2014.								
* Average Minutes of Use based on FCC 13-34 16th Mobile Wireless Competition Report issued March 19, 2013, Table 38. Avg MOU 615, Year 2011.								

### Comparable Local Usage and Equal Access

To demonstrate that its proposed federal Lifeline wireless plans are reasonable, Global Connection provided in AL Supplement 1A a summary comparing its federal Lifeline wireless plans to other retail and federal Lifeline offerings made by wireless and wireline local exchange carriers.

Chart 2 -- Comparison of Proposed Federal Lifeline Wireless Plans to California ILEC Federal Lifeline Wireless Measured Rate Plans and Prepaid Wireless Plans (Assuming Average Wireless MOU)

	Proposed Plans			ILEC MR Lifeline Plans				Prepaid Wireless Retail Plans					
Global Connection Inc of America dba Stand Up Wireless	Stand Up 1,000	Stand Up Unlimited Talk & Text	Stand Up Unlimited Talk & Text & 1 GB Data	AT&T Lifeline MR (minimum)	AT&T Lifeline MR (maximum)	Verizon Lifeline MR (minimum)	Verizon Lifeline MR (maximum)	Virgin Mobile PayLo 1500	Nexus Reach Out Simple Plan 1000	Metro PCS Unlimited	AT&T Go Phone Unlimited Talk & Text	Sprint Basic Plus	Verizon Talk & Text 450
Avg. MOU*	615	615	615	615	615	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	1000	Unlimited	Unlimited	146	146	146	146	1500	1000	Unlimited	Unlimited	Unlimited	450
Texts included	1000	Unlimited	Unlimited	-	-	-	-	1500	-	Unlimited	Unlimited	Unlimited	Unlimited
Data included	-	-	1 GB	-	-	-	-	30 MB	-	Unlimited	Unlimited	Unlimited	-
Avg. Excess MOUs**	-	-	-	469	469	469	469	-	-	-	-	-	165
Cost per Min in excess of allowance	-	-	-	\$0.033	\$0.033	\$0.033	\$0.033	\$0	\$0	\$0	\$0	\$0	\$0.45
Cost of excess minutes	-	-	-	\$15.48	\$15.48	\$15.48	\$15.48	\$0	\$0	\$0	\$0	\$0	\$74.25
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$12.65	\$30.75	\$35.75	\$2.50	\$3.66	\$2.50	\$3.66	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$59.99
Total GO 153 Cost to Customers	\$12.65	\$30.75	\$35.75	\$17.98	\$19.14	\$17.98	\$19.14	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$134.24
Caller ID	\$0.00	\$0.00	\$0.00	\$9.99	\$9.99	\$7.95	\$7.95	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Long Distance	\$0.00	\$0.00	\$0.00	\$6.99*	\$6.99*	\$15.99	\$15.99	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Voicemail	\$0.00	\$0.00	\$0.00	N/A	N/A	\$7.45	\$7.45	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Federal Excise Tax	\$0.00	\$0.00	\$0.00	\$0.08	\$0.11	\$0.08	\$0.11	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Additional costs of vertical features	\$0.00	\$0.00	\$0.00	\$17.06	\$17.09	\$31.47	\$31.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Cost to Lifeline Customers with 615 MOU and additional costs of vertical features	\$12.65	\$30.75	\$35.75	\$35.04	\$36.23	\$49.45	\$50.64	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$134.24
Plan choices based on AL Supplement 1A filed November 10, 2014.													
* Average Minutes of Use based on FCC 13-34 16th Mobile Wireless Competition Report issued March 19, 2013, Table 38. Avg MOU 615, Year 2011.													

CD staff finds it in the public interest to approve the *Stand Up 1,000 Plan* for \$12.65 per month, *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month, *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month because they offer low-income customers competitive voice and pricing choices and equal or better value with more minutes per bucket.

### Due Diligence Review:

An integral part of CD's processing of an ETC designation request is a due diligence review of the requesting carrier as a supplement to the public interest analysis to determine if the carrier has engaged in behavior that may call into question its fitness to be granted ETC designation to serve California consumers. The due diligence review includes, but is not limited to, CD's conducting independent research about a carrier's past operations to provide the Commission with information that may be pertinent in deciding whether or not to grant the ETC designation request. Typical research methods include performing Lexis/Nexis legal resource searches, Google Internet searches, reviewing industry and trade publications, querying other governmental agencies (e.g. California Secretary of State for business registration), contacting the FCC and USAC, reviewing a company's history of operations, and contacting the Commission's Safety and Enforcement Division and Consumer Affairs Branch.

To continue its commitment to protect against waste, fraud, and abuse of the Lifeline program, CD staff considered the FCC's *Notice of Apparent Liability for Forfeiture* (NAL) issued December 9, 2013, to Global Connection.<sup>22</sup> The NAL alleges that the company willfully

<sup>22</sup> FCC 13-155 (December 9, 2013).

violated 47 C.F.R. §§ 54.407, 54.409, and 54.410 by requesting and receiving reimbursement payments from the Universal Service Fund for intra-company duplicate Lifeline enrollments. The basis for the NAL resulted from USAC's in-depth validation review in specified months of 2012 and 2013 in ten states to identify intra-company and inter-company duplicates. Of 121,823 subscribers reported, USAC identified 2,231 intra-company duplicates during the period of June 2012 through May 2013, an error rate of 1.8%. CD staff finds that this duplicate rate is low. While CD staff has used 1.5% in the past as an acceptable level of error for duplicate enrollments, the *National Lifeline Accountability Database* (NLAD) and the California LifeLine third party administrator's database of California LifeLine customers ensure that only eligible California households will receive California and federal Lifeline benefits from ETC carriers.

CD staff did not uncover any fitness issues in its due diligence review to deny approval of Global Connection's ETC request. We, therefore, find that Global Connection's ETC request is consistent with the public interest. If substantive public interest issues emerge concerning Global Connection's operations after this ETC is approved, the Commission may pursue an enforcement action against the company which may include fines, penalties, and the revocation of ETC designation and/or wireless identification registration authority.

#### **Safety Concerns:**

Although wireless phone service offers great mobility for consumers, CD staff notes safety concerns related to wireless mobile phone service and E-911 and/or 911 connection limitations. Where there is a lack of coverage, poor signal strength, or atmospheric or terrain conditions that affect connections, emergency calls may not be completed. In rural areas, for example, with spotty connectivity or interference (e.g. due to geographic or structural obstacles), wireless mobile resellers of wholesale facilities service cannot guarantee full, accessible emergency connections for their own direct customers. An incomplete emergency call can have devastating results. Given that E-911 and/or 911 safety is a common concern for all of California's wireless customers, CD staff recommends that Global Connection be required to fully and clearly inform prospective federal Lifeline wireless customers that coverage limitations may affect wireless mobile phone service access to E-911 and/or 911 in the event of an emergency. Such disclosures include, but are not limited to, clear statements on marketing materials and conspicuous placement on the public website in the form of information content on webpages, footnotes, and/or listings on a frequently asked questions (FAQ) webpage.

#### **Future Changes to Federal Lifeline Wireless Plans:**

Regarding future changes that Global Connection may want to make to the federal Lifeline wireless plan offerings, including service area changes, CD staff recommends as follows:

1. For changes to Global Connection's Lifeline-only plans that are not based on retail plans currently available to all prospective customers at the time of filing, the company must file a Tier II Advice Letter to request approval of any changes.<sup>23</sup>

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<sup>23</sup> Resolution T-17339 Ordering Paragraph 3.

Such request shall demonstrate that the change complies with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable GO 153 rules, and pricing rules pursuant to D.10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request; and

2. For changes to its approved service area, the company must file a Tier II Advice Letter to request approval and include a map(s) in Shapefile format of the proposed area.

**Final Conclusions and Staff Recommendations:**

CD staff recommends conditional approval of Global Connection's request for an ETC designation for the purpose of offering federal Lifeline wireless service in California in the service areas of the URF carriers, excluding the Small LEC service areas. CD staff specifically recommends conditional approval for Global Connection to offer these plans:

- *Stand Up 1,000 Plan* for \$12.65 per month
- *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month
- *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month

Each Lifeline rate plan is subject to a one-time \$39 activation fee or service conversion fee. Additional minutes can be purchased in increments of 100 units for \$5 or 250 units for \$12.75, both at \$0.05 per minute.

CD staff recommends the Commission set forth the following conditions for Global Connection's ETC designation:

- Global Connection must adhere to applicable state and federal consumer protection and service quality standard requirements and to the CTIA Code, as amended from time to time;
- Global Connection must file required annual reports and compliance reports with the FCC, USAC and the Commission, as directed;
- Global Connection must comply with 47 C.F.R. § 54.401(d) by filing the required information directly with USAC to certify that its federal Lifeline wireless plans meet federal requirements under the USAC administration. Global Connection is obligated to report within 30 days of receipt from USAC that compliance has been achieved via a letter to the Director of CD including a copy of the information submitted to USAC and a copy of Global Connection's certification of approval from the USAC;
- Global Connection must provide marketing materials to the CPUC California LifeLine staff for review prior to distribution and advertising which will clearly label its plans as "*federal Lifeline service*";
- Global Connection must continue to comply with CPUC User Fee and universal service public purpose program surcharge requirements. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but

not limited to, revocation of Global Connection's ETC designation and/or wireless identification registration authority;

- Global Connection must file a copy of updated ZIP+4 code data list with the Director of CD and the California LifeLine Administrator; and,
- Global Connection must post safety concerns about wireless telephone service coverage limitations on distributed materials and on its company website.

## **COMMENTS**

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on November 14, 2014, informing all parties on the eligible telecommunications carrier service list of the availability of this resolution for public comments at the Commission's website [www.cpuc.ca.gov](http://www.cpuc.ca.gov). The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available at this same website.

CD did not receive comments on this resolution.

## **FINDINGS AND CONCLUSIONS**

1. Global Connection Inc. of America, doing business as "*Stand Up Wireless*," is a prepaid wireless service provider that resells the services of Sprint through its agreement with Boomerang Wireless, doing business as Ready Mobile, LLC.
2. Global Connection Inc. of America's principal offices are located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia, 30093.
3. On March 22, 2012, the Commission issued Global Connection Inc. of America, its Wireless Identification Registration number U-4423-C allowing it to operate as a commercial mobile radio service (CMRS) provider to the public in California.
4. On March 26, 2013, Global Connection Inc. of America filed Tier III Advice Letter (AL) 1 requesting eligible telecommunications carrier (ETC) designation to offer only federal Lifeline prepaid wireless service to eligible customers doing business as "*Stand Up Wireless*." Global Connection proposed five Lifeline-only offerings to which it will apply the \$9.25 federal support amount.
5. On Global Connection Inc. of America only seeks federal Lifeline support and does not seek California LifeLine fund support.
6. On November 10, 2014, Global Connection Inc. of America filed AL Supplement 1A, modifying its request to offer from five to three new plans and to request waivers from some General Order 153 basic elements.

7. To ensure that Global Connection complies with its obligation to provide service to prospective Lifeline customers within the network service area pursuant to Federal Communications Commission (FCC) rules, Global Connection shall submit an Information Only report quarterly to the Communications Division Director. The report shall include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities, or employing, leasing or constructing an additional cell site); and, the date of completion.
8. Global Connection Inc. of America shall file all federal compliance reports, including but not limited to the Form 481 and 47 C.F.R § 54.422 annually as required, and provide copies of these reports to this Commission when they are filed with the FCC and Universal Service Administrative Company (USAC).
9. Global Connection Inc. of America shall file the required service plan information pursuant to 47 C.F.R. § 54.401(d) with USAC. Once accepted by USAC, a copy of the information submitted to USAC and a copy of Global Connection Inc. of America's certification of approval from the USAC shall be provided to the Communications Division Director within 30 days of receipt from USAC.
10. Global Connection Inc. of America meets the FCC's ETC requirements.
11. Global Connection Inc. of America requested waivers of California LifeLine service elements: (4) the ability to receive free incoming calls, (10) choice of flat-rate or measured-rate service, (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory, (15) free access to 800 and 800-like toll-free numbers, (19) free access to toll-blocking service, and (20) free access to toll-control service.
12. It is reasonable to grant waivers for California LifeLine elements (4), (10), (11), (12), and (15) because they do not apply to wireless service providers and the Commission has granted such waivers in the past to other federal Lifeline wireless service providers.
13. It is reasonable to grant waivers to California LifeLine elements (19) and (20) because they do not apply to Global Connection Inc. of America's proposed service plans since there is no distinction between local and long distance calling for wireless services.
14. Global Connection Inc. of America shall comply with all General Order 153 rules including the Lifeline consumer enrollment process, prequalification, certification, eligibility verification and annual renewal, and working with California's LifeLine Administrator to establish customer eligibility, and to cooperate with the California



LifeLine team in the review and approval of its federal Lifeline advertisement materials.

15. The Communications Division recommends that Global Connection Inc. of America's ETC designation request be contingent on the following:
- Global Connection commit adhere to applicable state and federal consumer protection and service quality standard requirements and to adhere to the CTIA Code, as amended from time to time.
  - Global Connection must file required annual reports and compliance reports with the FCC and the Commission, as directed;
  - Global Connection must comply with 47 C.F.R. § 54.401(d) by filing the required information directly with USAC to certify that its federal Lifeline wireless plans meet federal requirements under the USAC administration. Global Connection is obligated to report within 30 days of receipt from USAC that compliance has been achieved via a letter to the Director of CD including a copy of the information submitted to USAC and a copy of Global Connection's certification of approval from the USAC;
  - Global Connection must provide marketing materials to the CPUC California LifeLine staff for review prior to distribution and advertising which will clearly label its plans as "federal Lifeline service";
  - Global Connection must continue to comply with CPUC User Fee and universal service public purpose program surcharge requirements. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but not limited to, revocation of Global Connection's ETC designation and/or wireless identification registration authority;
  - Global Connection must file a copy of updated ZIP+4 code data list with the Director of CD and the California LifeLine Administrator; and,
  - Global Connection must post safety concerns about wireless telephone service coverage limitations on distributed materials and on its company website.

We find CD's recommendations reasonable and adopt them.

16. Global Connection Inc. of America shall label clearly its wireless offerings as *federal Lifeline service* to minimize customer confusion between the California LifeLine and federal Lifeline programs, to include adequate information about the potential coverage and service quality issues, and to provide copies to Communications Division of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures, for CPUC California LifeLine staff to review and approval prior to publication and distribution.
17. Global Connection Inc. of America shall comply with CPUC User Fee and universal service public purpose program surcharge requirements.

18. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but not limited to, revocation of Global Connection Inc. of America's ETC designation and/or wireless identification registration authority.
19. Global Connection Inc. of America shall utilize the ZIP+4 code data of the Small LECs' service areas to ensure that current customers of the Small LECs are not accepted as its federal Lifeline customers.
20. Global Connection Inc. of America shall be authorized to receive from the Small LECs an updated ZIP+4 code data in their corresponding service areas within 30 days of the effective date of this Resolution. Global Connection Inc. of America shall also be authorized to receive from the Small LECs, on an as-needed basis, any update to the ZIP+4 code data to Global Connection Inc. of America, as with all other wireless designated ETCs in California. Global Connection Inc. of America shall file a copy of any updated ZIP+4 code data with the Communications Division Director and the California LifeLine Administrator (CLA). The ZIP+4 code data shall be provided in an MS Excel file (xls) format via email to the CD director and to the CLA in a format specified by the CLA.
21. Global Connection Inc. of America's three proposed plans meet federal ETC criteria for public interest determination with the benefits of increased competitive choice, convenience, security with mobility, ability to purchase additional usage, and ability to send and receive text messages in a prepaid plan.
22. Global Connection Inc. of America's federal Lifeline wireless plans have equal or better value in its Lifeline plan pricing for low-income customers:
  - *Stand Up 1,000 Plan* for \$12.65 per month
  - *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month
  - *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month
23. Communications Division finds Global Connection Inc.'s duplicate error rate of 1.8% during the period of June 2012 through May 2013 exceeds the 1.5% used as a guideline for an acceptable level of intra-company duplicates. However, the FCC's adoption of the NLAD process in April 2014 and CA LL third party administrator validation process prevent future intra-company duplicates.
24. Communications Division conducted due diligence review to determine Global Connection Inc. of America's fitness as it relates to business practice behavior and customer protection that may call into question its fitness to be granted ETC designation to serve California consumers. Communications Division found no fitness issues.
25. The Commission may pursue an enforcement action which may include fines, penalties, and the revocation of ETC designation and/or wireless identification registration authority should substantive issues emerge after this ETC is approved

which raises public interest questions about Global Connection Inc. of America's operations.

26. For public safety reasons, Global Connection Inc. of America shall clearly inform Lifeline customers that coverage limitations may affect wireless mobile service including E-911/911 emergency calls. Disclosures shall include, but are not limited to, clear statements on all marketing materials and the company website.
27. Global Connection Inc. of America shall file a Tier II Advice Letter to request approval for any future changes to the federal Lifeline wireless plans approved in this Resolution since these are not based on a retail plan currently available to all prospective customers. Such request shall demonstrate that the changes comply with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable General Order 153 rules, and pricing rules pursuant to Decision 10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request.
28. Global Connection Inc. of America shall file a Tier II Advice Letter to request approval to changes to its approved service area and include a map(s) in Shapefile format of the proposed area.
29. On November 14, 2014, the Commission emailed a draft of this resolution to the eligible telecommunications carrier service list for public comments.
30. Communications Division did not receive comments on this resolution.

**THEREFORE, IT IS ORDERED** that:

1. The Commission conditionally approves Global Connection Inc. of America's (U-4423-C), doing business as "*Stand Up Wireless*," request for an eligible telecommunications carrier (ETC) designation to provide federal Lifeline prepaid wireless service throughout California in the service areas of the uniform regulatory framework carriers, excluding the small local exchange carrier (Small LECs) service areas.
2. Global Connection Inc. of America's ETC designation approval shall be contingent upon the following:
  - Global Connection shall adhere to applicable state and federal consumer protection and service quality standard requirements and to the CTIA Code, as amended from time to time
  - Connection shall file required annual reports and compliance reports with the FCC, USAC, and the Commission, as directed;
  - Global Connection Inc. of America shall submit to the Communications Division Director a copy of the information submitted to USAC and a copy of

- Global Connection Inc. of America's certification of approval from the USAC within 30 days of receipt from USAC of its compliance with 47 C.F.R. § 54.401(d) related to its federal Lifeline wireless plans;
- Global Connection shall provide marketing materials to the CPUC California LifeLine staff for review prior to distribution and publication;
  - Global Connection must continue to comply with CPUC User Fee and universal service public purpose program surcharge requirements. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but not limited to, revocation of Global Connection's ETC designation and/or wireless identification registration authority; and,
  - Global Connection shall clearly identify its wireless mobility safety content on all distributed federal Lifeline materials and on its company website.
3. Global Connection Inc. of America shall be authorized to offer three federal Lifeline wireless service plans doing business as "*Stand Up Wireless*":
- *Stand Up 1,000 Plan* for \$12.65 per month
  - *Stand Up Unlimited Talk & Text Plan* for \$30.75 per month
  - *Stand Up Unlimited Talk, Text and 1 GB Data Plan* for \$35.75 per month
- Each Lifeline rate plan is subject to a one-time \$39 activation fee or service conversion fee. Additional minutes can be purchased in increments of 100 units for \$5 or 250 units for \$12.75, both at \$0.05 per minute.
4. Global Connection Inc. of America shall use a Tier II Advice Letter to request approval for any future changes to three federal Lifeline plans approved in this Resolution. Such request shall demonstrate that the changes comply with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable General Order 153 rules, and pricing rules pursuant to Decision 10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request.
5. Global Connection Inc. of America shall file a Tier II Advice Letter to request approval for any changes to the service areas approved in this Resolution and include a map(s) in Shapefile format of the proposed area.
6. Global Connection Inc. of America shall comply with all General Order 153 rules including the Lifeline consumer enrollment process, prequalification, certification, eligibility verification and annual renewal, and work with the California LifeLine Administrator to establish customer eligibility.
7. Global Connection Inc. of America shall be authorized waivers for these seven requested service elements of California LifeLine: (4) the ability to receive free incoming calls; (10) choice of flat-rate or measured-rate service; (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory,

and (15) free access to 800 and 800-like toll-free numbers, (19) free access to toll-blocking service, and (20) free access to toll-control service.

8. Global Connection Inc. of America shall clearly label its offerings as *federal Lifeline service* to minimize customer confusion between the California LifeLine and federal Lifeline programs, shall include adequate information about the potential coverage and service quality issues, and shall provide copies of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures for Communications Division's California LifeLine staff review and approval prior to distribution of marketing publications.
9. Global Connection Inc. of America shall implement the ZIP+4 codes to screen customers and ensure that current customers of the Small LECs are not accepted as federal Lifeline wireless customers with Global Connection Inc. of America.
10. Global Connection Inc. of America shall be authorized to receive from the Small LECs an updated list of the ZIP+4 code data in their service areas within 30 days of the effective date of this Resolution. Global Connection Inc. of America shall also be authorized to receive from the Small LECs on an as-needed basis any update to the ZIP+4 code data to Global Connection Inc. of America, the same as with all other active wireless designated ETCs in California. A copy of any updated ZIP+4 code data shall be filed with the Communications Division Director and the California LifeLine Administrator. The ZIP+4 code data shall be provided in an MS Excel file (.xls) format via email to the Communications Division Director and to the California LifeLine Administrator in a format specified by the CLA.
11. Global Connection Inc. of America shall submit to the Communications Division Director an Information Only report quarterly beginning in the first quarter of 2015 of service requests from customers living in the designated service area but outside of its existing network coverage. The report would include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities, or employing, leasing or constructing an additional cell site); and, the date of completion.
12. Global Connection Inc. of America shall comply with all applicable Commission rules and regulations including the reporting and payment of Public Utilities Commission User Fees and universal service public purpose program surcharges. Failure to do so may result in the revocation of its ETC designation and wireless identification registration authority to operate in California.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on December 18, 2014, the following Commissioners voting favorably thereon:

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PAUL CLANON  
Executive Director

**APPENDIX A**  
**Resolution T-17466**

**Attachment A**  
**Resolution T-17455**  
**Global Connection Inc. of America**  
**doing business as *Stand Up Wireless***

**Proposed Service Area for Federal Lifeline Wireless  
ETC Service in California**





**Attachment B**  
**Resolution T-17466**  
**Global Connection Inc. of America**  
**doing business as *Stand Up Wireless***

**General Order 153 – Service Elements of California LifeLine**

California LifeLine is composed of the service elements set forth below. All California LifeLine subscribers are entitled to receive every one of the service elements of California LifeLine, and every California LifeLine Service Provider is required to offer all of the service elements of California LifeLine to each of its subscribers. The service elements of California LifeLine are as follows:

- 1 Access to (a) single party local exchange service or (b) service that is equivalent, in all substantial respects, to single party local exchange service.
- 2 Access to all interexchange carriers offering service in the California LifeLine subscriber's local exchange.
- 3 Ability to place calls.
- 4 Ability to receive free unlimited incoming calls.
- 5 Free touch-tone dialing.
- 6 Free unlimited access to 911/E-911.
- 7 Access to local directory assistance (DA). Each California LifeLine Service Provider shall offer to its subscribers the same number of free DA calls that the California LifeLine Service Provider provides to its non-California LifeLine residential customers.
- 8 Access to foreign Numbering Plan Areas.
- 9 California LifeLine rates and charges.
- 10 Customer choice of local Flat-Rate Service or Measured-Rate Service. The 14 small ILECs identified in D. 96-10-066 do not have to offer subscribers the choice of local Flat or Measured-Rate Service, unless the small ILEC offers this option to its non-California LifeLine residential customers.
- 11 Free provision of one directory listing per year as provided for in D. 96-02-072.
- 12 Free white pages telephone directory.
- 13 Access to operator service.
- 14 Voice grade connection to the public switched telephone network.
- 15 Free access to 800 or 800-like toll-free services.
- 16 Access to telephone relay services as provided for in Public Utilities Code §2881 et seq.
- 17 Toll-free access to customer service for information about California LifeLine, service activation, service termination, service repair, and bill inquiries.
- 18 Toll-free access to customer service representatives fluent in the same language (English and non-English) in which California LifeLine was originally sold.
- 19 Free access to Toll-Blocking Service.
- 20 Free access to Toll-Control Service but only if (i) the California LifeLine Service Provider is capable of offering Toll-Control Service and (ii) the California LifeLine subscriber has no unpaid bill for toll service.
- 21 Access to two residential telephone lines if a low-income household with a disabled person requires both lines to access California LifeLine.
- 22 Free access to the California Relay Service via the 711 abbreviated dialing code.

GO 153 (Effective December 1, 2011 – D.10-11-033, Resolution T-17321)